

Highway Development Control Consultation Response

Planning Application Ref: PL/2025/09825

Site Address: Land at Gate Farm, High Street, Sutton Benger

Proposal: Outline planning application (with all matters reserved except means of access from the B4069) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of a new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.

Date of Consultation Response: 03/02/2025

I refer to the above planning application dated 17/12/2025 with regard to outline permission with all matters reserved except for access for the erection of up to 90 dwellings.

Sutton Benger is classed as a larger village which has a limited range of employment, services and facilities, as this would lead to separate dwellings outside of the identified core settlement framework boundary, the proposal would usually attract an adverse highway recommendation on sustainability grounds as follows:

The site is located outside of any settlement policy boundary, raising concerns with regards to the sustainability of the site for residential development due to the likely reliance upon the private car for any occupants and their visitors. This proposal is therefore, in my opinion, contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy and Section 9 of the National Planning Policy Framework 2023, which aims to reduce the need to travel particularly by private car and encourage the use of sustainable transport alternatives. However, I shall be guided by you on this sustainability issue and wish to advise with regard to highways in the instance that you would be minded to permit dwellings in this location.

The site is located to the north of the B4069 High Street, a B classified section of public highway subject to a speed limit of 30mph over most of the site frontage with the highway, this limit changes to 50mph at the western extent of the site as you leave the village.

The proposed access and external footway would be required to be part of a Section 278 Highways Agreement. Plans have been submitted to show the location of the access in context with the existing infrastructure; this includes a tie-in to the existing footway which is narrow and would not cater fully for the development. There is space within the public highway to provide a widening of the footway in this location and this should be investigated further to enable alternative modes to the private motor vehicle.

The access is located such that it is in direct conflict with a dwelling access opposite, with no footway provision on the southern side of High Street this hinders crossing in this location. It would be beneficial to place the access either side of the dwelling access to enable safer crossing in this location. I am aware that a previous application for farm access was permitted at appeal, however this would have been less intensively used and would not have had the same implications for crossing. The applicant could provide a short area of footpath and crossing point, or move the access to remove this conflict.

The access is wholly within the 30mph limit and as such Manual for Streets would recommend a minimum visibility splay of 2.4m x 43m. A visibility splay of 2.4m x 47.8m has been demonstrated to the north and 2.4m x 58.05m to the south at the point of access with the public highway and this is within the public highway, therefore it is clear that visibility is achieved for the 85th percentile speeds recorded on High Street of a maximum of 37.19mph

when entering the village and 32.42mph when exiting the village. Both demonstrated visibility splays are in accordance with requirements within Manual for Streets.

The access shown is included in full detail for approval as part of the outline application, this shows a simple priority junction with 6m radii at 5.5m width and a 2m footway connection on the south side which would extend into the site. On the north side of the access the footway appears to be some 2.5m width for the initial 25m from High Street, with a 2m verge, and the carriageway increasing to some 7.5m which appears to be to enable access and parking bays, though this would be considered at reserved matters.

The crossing points on the access appear to have been omitted and should be included at this point to reduce the conditions required if permission is granted.

The footway would connect to existing pedestrian infrastructure on High Street which whilst it may allow connectivity for pedestrians and walking into the village to be an option for travel, the narrow nature of the existing infrastructure at about 1m would be a barrier to walking/cycling as well as the recorded 85th percentile speeds on High Street being higher than the posted limit as detailed above.

There is a proposed connection shown on the illustrative masterplan and suggested on the parameter plan which if provided may help to facilitate pedestrian/cyclist movements and should be part of the proposals for means of access, this should be provided as an all-weather shared surface footpath and discussed within the Transport Assessment as part of the access proposals.

The pedestrian access has not been addressed fully through this application, in order to provide inclusive access, the existing infrastructure should be upgraded and widened to facilitate the development as far as practicable, particularly for a safer route to school and the village.

A further consideration in regard to the access location is that of existing services infrastructure, there is a BT pole located in the access point which does not seem to have been considered. In order to avoid the conflict with any crossing requirements for the property access directly opposite and the need to relocate the BT pole, it may be beneficial to locate the access slightly further into the village, this is unlikely to affect the visibility splays achieved.

It would be useful if the applicant could investigate potential upgrading of existing footway provisions as part of the application to enable better provisions for pedestrians with widening/upgrading of the existing infrastructure, the current conditions would not be considered ideal for increased use for pedestrians.

The Transport Assessment has appropriate content in regard to the transport policy and guidance. The site context and local highway section highlights the permitted access, which would have severed the continuity for pedestrians on the existing footway.

The site context and local highway network has been discussed in terms of existing conditions. Routes to the village/school have been identified and personal injury collision data has been interrogated which show there to be no recorded incidents in the most recent 3-year period in line with the TA assessment criteria. Baseline traffic conditions have been indicated with 85th percentile speeds and 5-day average vehicle flows identified for the typical am and pm peak periods. The PIC data has indicated there to be no existing pattern or cluster of accidents that the development would be considered to address through the application.

Accessibility for the site is then discussed and it would appear that the majority of services and facilities identified are not accessible to pedestrians, with the exception of public transport which could provide access further afield for pedestrian traffic, though the service is limited to one or two hour frequency, the initial and final bus times would allow for a traditional working pattern of 9-5 to be catered for in terms of access to Chippenham. At 4.18 it is stated that the journey between Manor Farm bus stop and Chippenham Station is some 13 minutes, however the point 4.16 shows that the time between departure from Manor Farm and arrival at Chippenham would be some 37 minutes. Whilst it is concluded that the site's position and relative distance to services will provide opportunity for non-car mode trips, I believe this is very limited and the development would rely heavily on the private motor vehicle as the main mode of transport.

The TA then goes on to discuss the development proposals, detailing the access and visibility as discussed above. Further to the horizontal visibility demonstration, there is also a demonstration of the earthworks required to enable the visibility splays in the vertical plane ensuring that there would be no obstructions over 0.6m in either splay.

The internal layout is briefly discussed, however this would be approved under a Reserved Matters Application, though no discussion with regard to the indicated pedestrian access to the southwest of the site has been discussed further, which should be included as part of the access proposals.

A Framework Travel Plan has been provided as part of the planning application. The targets set out in section 6 are suitable, however it is not considered that the measures set out in section 5 would be able to achieve this. The inclusion of green travel vouchers for the first occupier of each dwelling is a key part of most travel plans which is currently missing. These should be included in the travel plan measures when a revised Full Travel Plan is submitted alongside a reserved matters planning application.

The next section of the TA deals with Forecast Trip Generation and takes into account the NPPF aspirations for a vision led approach. The trip generation has therefore been assessed at a core or worst case and with a vision, ultimately a reduction in 10% with increased sustainable travel modes. The core scenario trip generation is determined as an additional 2-3 vehicle trips on the network every 3 minutes, with a total of 16 vehicles arriving and 29 vehicles departing in the AM peak, in the PM peak there is anticipated to be 28 vehicles arriving 13 vehicles departing. This equates to less than 10% of the total flows recorded on the B4069 during each peak. The vision led scenario anticipated traffic generation relies upon robust measure in a travel plan and would seek to reduce the traffic generated from the site, however it would still equate to less than 10% of the main road traffic flows. The core scenario has been utilised to investigate traffic impact which as it would be considered a higher trip generation is deemed to be a robust assessment for the site. The assessment criteria is acceptable and appropriate growth factor have been applied to determine the impact of the development at opening year of 2030.

The traffic flows have been considered for capacity assessment of the M4 Junction 17 but concluded that the traffic generated would not have enough of an impact to require further assessment, which I would agree with.

PICADY has been used to assess the junction capacity at the proposed access based on the 2030 future year plus the development traffic. It would not appear that this has taken into account any committed development within Sutton Benger and to merely grow the existing traffic flows could give a false result when modelling future years, given the amount of consented development which is not yet complete on the western side of the village. The RFC's are well within the operational capacity, however, therefore the additional traffic may

not have an impact, but for robust assessment it is considered that committed development should be accounted for in the assessments.

There are a number of issues in regard to the access and assessments which require further attention and at this stage it is considered that the access proposals have not been fully demonstrated as safe and convenient for all users of the public highway.

If the issues highlighted above could be addressed then I will be in a position to make a recommendation with regard to highways.

If you have any queries regarding the above advice, please contact:

HighwaysDevelopment@wiltshire.gov.uk